

**IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF ALABAMA  
EASTERN DIVISION**

<b>GINGER DAYTON, an individual;</b>	)	
	)	
<b>Plaintiffs,</b>	)	
	)	
<b>vs.</b>	)	<b>Civil Action No.:</b>
	)	<b>3:07CV599-MEF</b>
<b>STEVEN CHAD TAGGART, et al.;</b>	)	
	)	
<b>Defendants.</b>	)	

**PLAINTIFF'S OBJECTIONS TO THE DEFENDANT'S EXHIBIT LIST**

**COMES NOW** the Plaintiff, and objects to the following exhibits listed by the Defendant:

1. Plaintiff objects to any exhibit which contains hearsay information and has not been properly authenticated by the Defendant.
2. Plaintiff objects to the Defendant offering depositions as exhibits since the proper method for the introduction of deposition testimony is to read the deposition in open Court.
3. Plaintiff objects to 911 records since they have thus far not been produced and the Plaintiff is unaware of what is contained within those records.
4. Plaintiff objects to Ginger Dayton employment records from Vista Care since those records contain hearsay and have not been properly authenticated.
5. Plaintiff objects to accident reports for Ginger Dayton's prior accidents because they contain hearsay and have not been properly authenticated.

Respectfully submitted,

/s/ Richard F. Horsley  
**Richard F. Horsley**  
**Attorney for Plaintiff**

**OF COUNSEL:**

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**CERTIFICATE OF SERVICE**

\_\_\_\_\_ I hereby certify that I have served a copy of the above and foregoing Objections on all counsel of records listed below by placing a copy of same in the United States Mail, first class, postage pre-paid on this the 28<sup>th</sup> day July, 2008.

/s/ Richard F. Horsley  
**OF COUNSEL**

**Christopher Rogers**  
**Huie, Fernambucq & Stewart**  
**Three Protective Center, Suite 200**  
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